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Richmond, Virginia 23235

tel 804/320-1301
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WCVE-TV23
Richmond

WCVW-TV57
Richmond

88.9FM WCVE
Richmond

WHTJ-TV41
Charlottesville

WNVC-TV56
Fairfax/Washington D.C.

WNVF-TV53
Goldvein/Fredericksburg

Central Virginia
Educational
Telecommunications
Corporation

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May 17, 1999 FCC MAIL ROOM

Federal Communications Commission
Attn.: Magalie R. Salas
12th St. Lobby, TW-A325
445 12th St., SW
Washington, DC 20554

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Dear Ms. Salas:

Pursuant to the Commission's consideration of the establishment of a low power radio broadcast service, I am submitting comments on behalf of WCVE-FM, a noncommercial educational radio station in Richmond, Virginia.

WCVE-FM is a 8.3 kW Class B station, operating on Channel 205. The height above average terrain of our antenna is 256 meters. Our service area population is 851,000. WCVE-FM operates below maximum Class B power because of the need to protect the transmission of WTVR-TV, operating on Channel 6.

Significant audience exists for our station outside of our protected service contour, in our secondary service area. Of the 20,195 listeners who have made donations to our station, 1,234 reside in our secondary service area, and 150 reside *outside* our secondary service area. Of the 93,800 listeners estimated to listen to WCVE-FM in the Fall 1998 Arbitron survey, 7,500 reside outside of our protected contour. I am enclosing a map of our coverage area that also identifies locations where contributors to our station reside.

For listeners within and without our protected contour, WCVE-FM provides unique programming that is unduplicated by other stations. Our local program service includes broadcast of performances by the Richmond Symphony, the Virginia Opera and other fine arts organizations which, because of cost or distance, are inaccessible to many listeners. WCVE-FM provides information on fine arts activities throughout our service area through a weekly program featuring interviews with representatives of local fine arts groups and our broadcast several times per day of announcements on local fine arts opportunities. We also provide long-form local public affairs coverage through the broadcast of events such as speeches by foreign ambassadors and other international relations decision makers to the World Affairs Council of Greater Richmond.

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The programming offered by WCVE-FM, which includes classical music, jazz, folk music and radio drama, provides great diversity in the market we serve. Interference from new stations that impairs the ability of listeners in our secondary service area from receiving our signal could negatively impact the diversity of programming to which those listeners have access. Interference to WCVE-FM's signal in its secondary service area would also impede the station's ability to attract and retain members who provide primary financial support for its operations.


Low Power FM stations should be subject to the same restrictions as FM translators as specified in sections 74.1204(f) and 74.1204(g) of the Commission's rules. The FCC should require all new Low Power FM applicants to notify all co-channel, first adjacent, second adjacent and third adjacent, full power FM stations within 100 miles of the proposed new operations. In a similar manner, under section 73.525(a), Non-Commercial, Educational FM stations must notify affected television stations operating on Channel 6.

WCVE-FM suggests that all LPFM stations be "Secondary" to all existing and future full service FM stations, and that they be required to protect existing FM translator and Class D FM stations, in accordance with FCC Rule 74.1204(f).

WCVE-FM also urges the Commission not to consider 1000 Watt / 60 meter LPFM stations, since they exceed the minimum Class A Facilities of 100 Watts / 30 meters. Rather, it is recommended that LPFM stations be limited to 50 Watts / 30 meters, or equivalent, in a similar manner as FCC Rule 74.1235.

Please feel free to contact me if you have any questions.


Sincerely,


A handwritten signature in black ink, appearing to read "William N. Miller". The signature is fluid and cursive, with the first name "William" and last name "Miller" clearly distinguishable.


William N. Miller
Station Manager
WCVE-FM

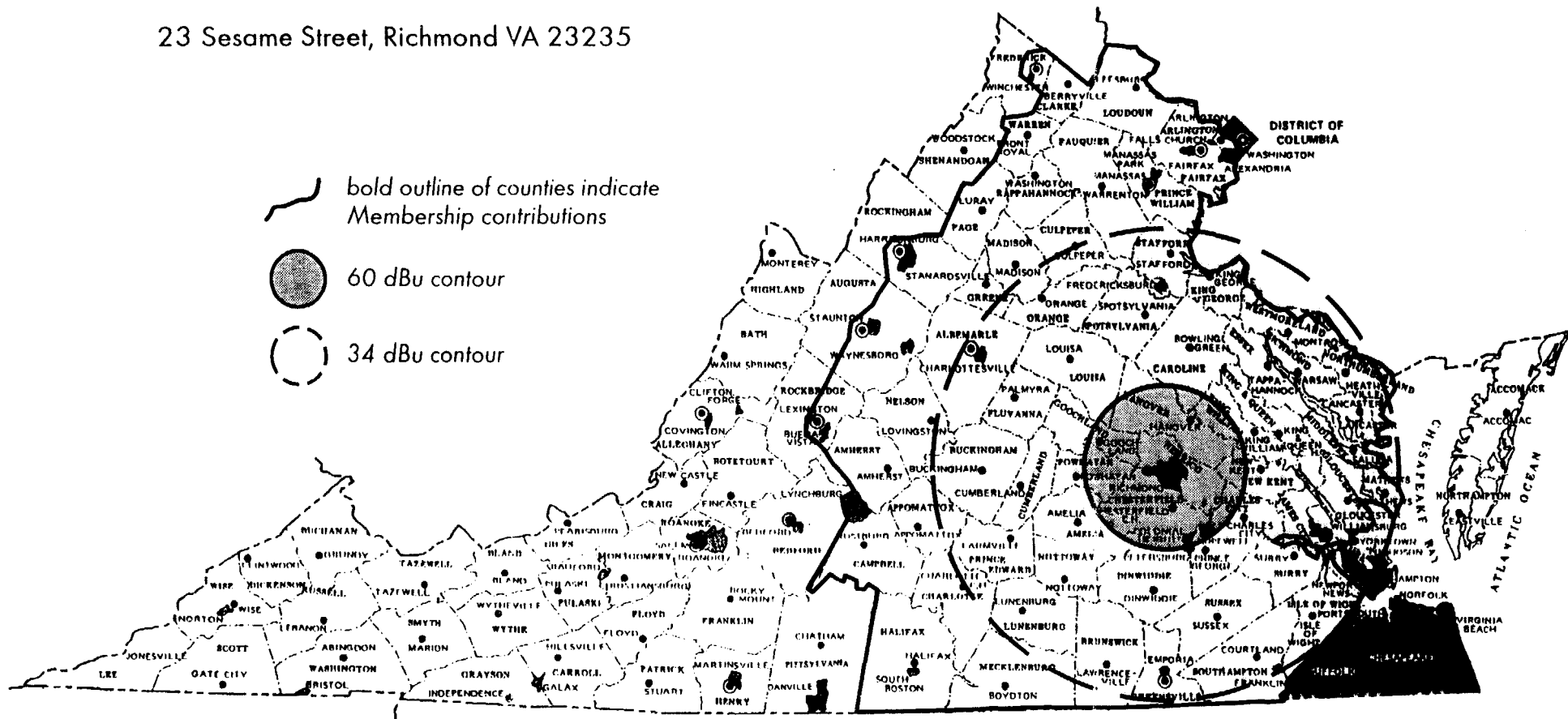
Enclosures

Central Virginia's Public Radio

 bold outline of counties indicate
Membership contributions

 60 dBu contour

 34 dBu contour



Coverage Map & Membership Areas